BAT
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Environmental, Health and Safety Services

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From: Daniel C. Black, TSCA Program Support
BAT – Fort Campbell, KY

Date: 10 June 2011

To: Wayne Bricker, Program Manager
TSCA Program, EnvDiv – DPW Ft. Campbell

cc: Nathan L. Reynolds, BAT Site Manager

Encl: (1) Special work practices Lead Containing Paint (LCP) Protocol
(2) LCP Protocol Quick Reference Handout
(3) Laboratory Results

Subj: Negative Exposure Assessment (NEA); Results of,

1. In accordance with the provisions of OSHA, applicable state and commonwealth directives and the Fort Campbell Lead Based Paint Management Plan, A Lead-Based Paint (LBP) Negative Exposure Assessment (NEA) was performed to ascertain the degree of exposure that lay persons would have when prepping a surface for re-painting that is coated with lead containing paint and to approve developed Special Work Practices if the NEA is Successful.

2. The NEA was conducted at building's 06097 and 06098, located on Fort Campbell, KY, under the auspices of the DPW, Environmental Division, and Compliance Branch – TSCA Program. The results of the Laboratory analysis of the samples collected are as follows:

Sample ID	Volume	Lead Concentrations	Findings
11137-6908-PR-01D	136.71	<0.00146(ug)	Special Work Practices Approved
11137-6908-PR-02D	147.87	<0.00135(ug)	Special Work Practices Approved
11137-6908-BL-03D	QC Blank	0.0(ug/m^3)	Special Work Practices Approved
11137-6908-BL-04D	QC Blank	0.0(ug/m^3)	Special Work Practices Approved

3. This NEA and the Special Work Practices developed from it are valid until 17May2012. With your approval, the prepping of surfaces coated with lead containing paint may be accomplished by non licensed and non certified personnel on Ft. Campbell, given that they follow the Special Work Practices developed under the auspices of the DPW, Environmental Div., Compliance Branch – TSCA Program for the time period annotated above.

Approved: Wayne Bricker Dated: 13 Jun 2011
Wayne Bricker, TSCA Program Manager

PROTOCOL
FOR LEAD CONTAINING PAINT
SURFACE PREPARATION

(Rev. May 2011)

Even if a painted surface is not a Lead-Based Paint (lead content of 5000 ppm or greater), OSHA requires that we protect workers from any lead content. This protocol is **for Lead Containing Paint (lead content of 4999 ppm or less)**. Under no circumstances shall this protocol be extended to encompass surface work on Lead-Based Paint. *Strict adherence to these work practices is paramount for proper health and safety.*

DIRECTIONS

1. Prep the area

a. Cover the ground / floor completely in the immediate vicinity of the work area with polyethylene drop cloth.
b. Mist the area to be scraped with a spray bottle containing a 4:1 mixture of water and soap[1].

2. Scrape

a. Begin removal from the highest point working down, utilizing paint scrapping / removal tool.
b. Scrape and remove only the paint that comes off easily. It is not necessary to remove all paint down to the original surface.

3. Clean up area

a. Fold all paint residue, surfactant and other debris into the polyethylene drop cloth.
b. Place drop cloth in opaque polyethylene bags and seal with duct tape.
c. Place that bag inside of another, securing the second bag in a "Goose Neck[2]" manner.
d. Deposit in a dumpster.

4. Clean yourself

a. Bathe completely.
b. Wash all clothes worn for the project.

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BOTTOM LINE: AVOID – PROTECT – CLEAN UP

AVOID creating or spreading paint chips and dust.
PROTECT yourself by practicing good personal hygiene.
CLEAN UP the work area prior to starting the job and upon completion of the job.

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[1] Non-foaming soap (such as automatic dishwasher soap.)
[2] Twist the top of the bag and fold it over and tape securely.

PROTOCOL
FOR LEAD CONTAINING PAINT (LCP)
SURFACE PREPARATION

(Rev. May 11)

This limited protocol is **for Lead Containing Paint (LCP) with a lead content of 4999 ppm or less**. (This protocol is **based upon an exposure assessment** for surface preparation at Bldg.'s 06097 & 06098, on 20 May 2011.)

Under no circumstances shall this protocol, based upon the exposure assessment performed, be extended to encompass surface work on Lead-Based Paint. **The exposure assessment and this protocol are only valid through 20 May 2012.** Follow on exposure assessments and protocols (similar to this one) will be forthcoming. The DPW Environmental Division should be consulted for any undated exposure assessment / protocol information.

Definitions:
Lead Based Paint (LBP) - Paint that has a lead content of 5000 ppm or greater.
Lead Containing Paint (LCP) - Paint that has a detectable lead content of 4999 ppm or less.

AVOID – PROTECT – CLEAN UP

AVOID creating or spreading dust with lead content.
PROTECT yourself by practicing good personal hygiene.
CLEAN UP the work area prior to starting the job and upon completion of the job.

TOOLS REQUIRED

Spray Bottle
Paint Scrapping / Removal Tool
Polyethylene Sheeting
Duct Tape
Large Opaque Polyethylene Trash Bags
Surfactant (mixture of water & soap[1], approximately 2:1)

[1] Non-foaming soap (such as an automatic dishwasher soap.)

DIRECTIONS

- Utilize polyethylene drop clothes to cover the ground completely in the immediate vicinity of the work area.

- Start surface preparation at the highest point.

- Utilizing the spray bottle filled with surfactant (see tools required), mist the area to be scrapped.

- Utilizing the paint scrapping / removal tool, scrape and remove and flaking paint. It is not necessary to remove all paint or remove paint down to the original surface.

- Upon completion; clean-up the area, fold all lead-containing paint residue, surfactant and other debris into the polyethylene drop cloth and place it in opaque trash bags, securing it in a "Goose Neck[2]" manner with duct tape.

- Place that bag inside of another, securing the second bag in the same manner.

- All project trash bags may be deposited in an applicable dumpster.

- Thoroughly wash and bathe completely, yourself and all clothes worn for the project.

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Note: This protocol calls for work practices that exceed the minimum requirements as set forth by applicable directives. Strict adherence to them is paramount for proper health and safety considerations.

[2] Twist the top of the bag and fold it over and tape securely.